REMED SITE ASSESSMENT DECISION - EPA P FION IX

Site Name: <u>Jervis B. Webb Co.</u>	Gi.	EPA ID #: <u>CAD008339467</u>						
Alias Site Names: Jervis B. Webb Co	ompany of California							
City: South Gate	County or Parish: Los Angeles	State: California						
Refer to Report Dated: 03/02	Report Type: GAO							
Report developed by: Lori Parnass		3						
DECISION:								
☐ 1. Further Remedial Site Assess	sment under CERCLA (Superfund) is	not required because:						
☐ 1a. Site does not qualify Action - NFA) and:	y for further remedial site assessment u	nder CERCLA (No Further						
☐ EPA is retaining thi interest in the site.	s site in CERCLIS because the Federal	Superfund program still has an						
action, or an appropriate means that EPA belonger may be returned.	is site in CERCLIS because it does not briate Federal Superfund response action ieves no further Federal Superfund respect to the CERCLIS site inventory if nevertund consideration is discovered.	n has been completed. This ponse is appropriate. Archived						
☐ 1b. Site may qualify for further action, but is deferred to: ☐ RCRA ☐ NRC								
2. Further Assessment Needed	Under CERCLA 2a.(Optional) Priori	ty: Higher Lower						
2b. Activity Type:	□ PA □ SI □ ESI □ Other							
DISCUSSION/RATIONALE:								
	umented soil and	a mundates						
· · · · · · · · · · · · · · · · · · ·	TX CONT.							
	ith vocs and met	/						
	urce jemediation	and the RIXXX						
	No Further Action							
_ sois. Granda	atei beneath the s	lite still watzins						
Vocs and met	zk gieztly in exc	ess of MCLs.						
Groundwater mo	nitorina is/ continuir	a but no octive						
Next. ws. Site is	s in see with reain	de aroundwater contamination						
Report Reviewed, Approved and Site Decision Made by:	Signature: Abduson	Daté: 5.15.07						

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January 30, 2002

Lori Parnass Department of Toxic Substances Control 1011 N. Grandview Avenue Glendale, CA 91201

e: 5030 Firestrone Blvd. and 9301 Rayo Ave., South Gate, CA

Dear Ms. Parnass:

As you requested, I am forwarding the following documents to you:

- IT, Soil Removal Activities, dated December 17, 2001;
- LARWQCB, Approval of "Work Plan for Clarifier Removal and Soil Remediation by Soil Vapor Extraction," dated May 18, 1999; and
- EKI, Report on Closure of Two Tanks at 9301 Rayo Avenue, dated December 10, 1996.

Please let me know if we can provide further information to you...

Yours very truly,

Michael Scott Feeley

of LATHAM & WATKINS

Enclosures

cc: Michael J. Farley

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January 29, 2002

BY HAND

Lori Parnass Department of Toxic Substances Control 1011 N. Grandview Avenue Glendale, CA 91201

Re: 5030 Firestrone Blvd. and 9301 Rayo Ave., South Gate, CA (the "Property")

Dear Ms. Parnass:

As requested in the letter dated January 15, 2002 to me from Rita Kamat of DTSC, we are providing you with copies of the following:

- Los Angeles Regional Water Control Board Soil Closure / No Further Action Letter for the Property, dated January 23, 2002;
- IT Corporation, Soil Closure Report, dated October 3, 2001;
- Dragun Corporation and IT Corporation, Groundwater and Soil Evaluation, 5030
 Firestone Boulevard and 9301 Rayo Avenue, South Gate, California, dated
 May 22, 2001.

These documents provide information responsive to Ms. Kamat's letter. In addition, we offer to provide you access to dozens of other environmental submissions regarding the Property which are in our possession. These include:

- IT Corporation Soil Removal Report, dated December 17, 2001,
- IT Corporation Submittal of Soil Analytical Data Spreadsheets, dated December 22, 2001;
- IT Corporation Work Plan for Soil Closure, Jervis B. Webb, 5030 Firestone Boulevard and 9301 Rayo Avenue, South Gate, California, dated June 25, 2001;
- IT Corporation, Addendum to Work Plan for Soil Closure, dated July 18, 2001.

LATHAM & WATKINS

Lori Parnass January 29, 2002 Page 2

- Erler and Kalinowski, Inc., Phase I Environmental Site Assessment of the Jervis B. Webb Company Properties at 9301 Rayo Avenue and 5030 Firestone Boulevard, South Gate, California, dated June 20, 1996;
- Erler and Kalinowski, Inc., Phase I1 Soil Investigation Report for Jervis B. Webb Company Property, 5030 Firestone Boulevard, South Gate, California, dated February 18, 1998;
- Erler and Kalinowski, Inc., *Phase II Groundwater Investigation Report, Jervis B. Webb Company Property, 5030 Firestone Boulevard, South Gate, California*, dated June 30, 1998;
- Erler and Kalinowski, Inc., *Transmittal of Results of Additional Groundwater Investigation and Proposed Well Installation*, dated October 21, 1998;
- Erler and Kalinowski, Inc., Proposed Tasks, Schedule and Work Plan for Additional Groundwater Investigation and Quarterly Groundwater Monitoring, dated September 29, 1998.
- Erler and Kalinowski, Inc., Additional Groundwater Investigation and Quarterly Groundwater Monitoring Report for October to December 1998, Jervis B. Webb Company Property, 5030 Firestone Boulevard, South Gate, California, dated January 13, 1999;
- Erler and Kalinowski, Inc., Work Plan for Clarifier and Removal and Soil Remediation by Soil Vapor Extraction at the Jervis B. Webb Company Property located at 5030 Firestone Boulevard, South Gate, California, dated April 14, 1999;
- Erler and Kalinowski, Inc., Quarterly Progress Report for January through March 1999 for the Jervis B. Webb Company Property, 5030 Firestone Boulevard, South Gate, California, dated June 4, 1999;
- Erler and Kalinowski, Inc., Quarterly Progress Report for April through June 1999 for the Jervis B. Webb Company Property, 5030 Firestone Boulevard, South Gate, California, dated July 30, 1999;
- Erler and Kalinowski, Inc., Quarterly Progress Report for July to September 1999 for the Jervis B. Webb Company Property, 5030 Firestone Boulevard, South Gate, California, dated October 13, 1999;
- Erler and Kalinowski, Inc., Quarterly Progress Report for October to December 1999 for the Jervis B. Webb Company Property, 5030 Firestone Boulevard, South Gate, California, dated February 4, 2000;

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Lori Parnass January 29, 2002 Page 3

- Erler and Kalinowski, Inc., Quarterly Progress Report for January through March 2000 for the Jervis B. Webb Company Property, 5030 Firestone Boulevard, South Gate, California, dated April 27, 2000;
- Erler and Kalinowski, Inc., Quarterly Progress Report for April through June 2000 for the Jervis B. Webb Company Property, 5030 Firestone Boulevard, South Gate, California, dated August 16, 2000;
- Erler and Kalinowski, Inc., Quarterly Progress Report for July through September 2000 for the Jervis B. Webb Company Property, 5030 Firestone Boulevard, South Gate, California, dated October 26, 2000;
- Erler and Kalinowski, Inc., Report on Site Conditions, Local Hydrogeology and Offsite Groundwater Production and Work Plan for Groundwater Remediation, Jervis B. Webb Company of California, 5030 Firestone Boulevard, South Gate, California, dated November 30, 2000;
- Erler and Kalinowski, Inc., Quarterly Progress Report for October through December 2000 for the Jervis B. Webb Company Property, 5030 Firestone Boulevard, South Gate, California, dated February 5, 2001;
- Erler and Kalinowski, Inc., Quarterly Progress Report for April through June 2001 for the Jervis B. Webb Company Property, 5030 Firestone Boulevard, South Gate, California, dated July 24, 2001.

Please contact me if you would like to conduct any further review and we can schedule a convenient time and date for you to visit our offices. My direct dial number is 213-891-7895.

Yours very truly,

Michael Scott Feeley

of LATHAM & WATKINS

cc: Michael J. Farley

Table 3. Summary of TCE and PCE Concentrations in Soil 5030 Firestone Boulevard South Gate, California Project #21025-02

Sample Number Depth (feet)	B1-5.5 5.5 mg/kg	B1-11 . 11 mg/kg	B1-20 20 mg/kg	B2-5.5 5.5 mg/kg	B2-10.5 10.5 mg/kg	B3-6 6 mg/kg	B3-11 11 mg/kg	B4-6 6 mg/kg	B4-16 16 mg/kg	B4-20.5 20.5 mg/kg	85-6 6 nig/kg	B5-10.5 10.5 mg/kg	B6-6 6 mg/kg	B6-10.5 10.5 mg/kg	B7-6 6 mg/kg	B7-11 11 mg/kg	B8-6 6 mg/kg	B8-11 11 .mg/kg	B9-5.5 5-5 mg/kg	B9-10.5 10.5 mg/kg	B10-6 6 mg/kg	B10-11 11 mg/kg	B11-6 6 mg/kg
PCE - tetrachloroethane	0.074	0.13	0.035	0.018	0.045	0.042	0.12	0.076	2.2	140	0.025	0.065	0.13	0.019	0.055	< 0.015	0.0029	0 041	0.0036	0.022	0.027	< 0.015	0.061
TCE - trichloroethene	0.024	0.037	0.04	0.0073	< 0.015	0.01	0.034	0.021	0.092	270	0.0053	0.19	0.031	0.025	0.019	< 0.015	< 0.0025	0 05	< 0.0025	0.041	0.0064	0.036	0.016
TCE/PCE	0.32	0.28	1.14	0.41	0.33	0.24	0.28	0.28	0.04	1.93	0.21	2.92	0.24	1.32	0.35	1	0.86	1 22	0.69	1.86	0.24	2.4	0.26

Sample Number Depth (feet)	B11-11 11 mg/kg	B12-6 6 mg/kg	B13-6 6 mg/kg	B15-10 10 mg/kg	B15-16 16 mg/kg	B15-20.5 20.5 mg/kg	B15-26,5 26.5 mg/kg	B15-31 31 mg/kg	B15-35.5 35.5 mg/kg	B15-40 40 mg/kg	B16-6 6 mg/kg	B16-11 11 mg/kg	B16-16 16 mg/kg	B16-21 21 mg/kg	B16-26 26 mg/kg	B16-31 31 mg/kg	B16-35.5 35.5 mg/kg	B16-41 41 mg/kg	B16-46 46 mg/kg	B16-51 51 mg/kg	B17-6 6 mg/kg	B17-11 11 mg/kg	B17-16 16 mg/kg
. PCE - tetrachloroethane TCE - trichloroethene TCE/PCE	< 0.014 0.035 2.5	< 0.0025 < 0.0025 1	< 0.0025 < 0.0025 1	< 0.005 < 0.005 1	< 0.005 < 0.005	< 0.005 < 0.005 1	0.054 0.38 7.04	0.041 0.52 12.68	0.026 0.14 5.38	< 0.005 1.2 240	< 0.005 < 0.005 1	< 0.005 < 0.005 1	0.027 < 0.005 '0.19	0.041 < 0.005 0.12	0.047 < 0.005 0.11	0.027 < 0.005 0.19	< 0.005 < 0.005 1	< 0.005 0.41 82	< 0.005 0.39 78	< 0.005 1.3 260	< 0.005 < 0.005 1	< 0.005 < 0.005 1	< 0.005 < 0.005 1

Sample Number Depth (feet)	B17-21 21 mg/kg	B17-26 26 mg/kg	B17-31.5 31.5 mg/kg	B17-36 - 36 mg/kg	B17-41 41 mg/kg	B17-46 46 mg/kg	B17-53.5 -53.5 mg/kg	B18-11 11 mg/kg	B18-16 16 mg/kg	B18-21 21 mg/kg	E18-27 27 mg/kg	B18-31 31 mg/kg	B18-36 36 mg/kg	B18-41 41 mg/kg	B18-46 , 46 mg/kg	B19-16 16 mg/kg	B19-21 21 mg/kg	B19-26 26 mg/kg	B19-31 31 mg/kg	B19-36.5 36.5 mg/kg	B19-41 41 mg/kg	B19-46 46 mg/kg
PCE - tetrachloroethane	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	0.4	0.37	0.66	0.093	0.14	< 0.005	0.091	0.18	0.42	0.28	0.28	0.25	< 0.005	0.16	0.18
TCE - trichloroethene	< 0.005	0.048	0.056	1.4	1.2	1.6	1.4	0.11	0.61	16	0.75	2	. 0.056	2.3	8.7	0.2	1.8	1.5	, 1.2	0.11	4	4.3
TCE/PCE	1	, 9.6	11.2	280	240	320	280	0.28	1.65	24.24	8.06	14.29	11.2	25.27	48.33	0.48	6.43	5.36	4.8	22	25	23.89

Sample Number Depth (feet)	MW1-10.5 10.5 mg/kg	MW1-20.5 20.5 mg/kg	30.5 mg/kg	MW2-10.5 10.5 mg/kg	MW2-20.5 20.5 mg/kg	MW2-30.5 30.5 mg/kg	MW3-11 11 mg/kg	MW3-20.5 20.5 mg/kg	MW3-30.5 30.5 mg/kg	MW5-21 21 mg/kg	MW5-31 31 mg/kg	MW5-41 41 mg/kg
PCE - tetrachloroethane TCE - trichloroethene TCE/PCE	0.021 0.018 0.86	0.023 0.062 2.7	0.011 0.06 5.45	<0.005 <0.005 1	<0.005 <0.005	<0.005 <0.005 1	<0.005 <0.005 1	<0.005 <0.005 1	<0.005 <0.005 1	<0.0025 0.022 8.8	<0.0025 0.011 4.4	<0.050 0.55 11

NOTES: 1) Analyses performed by Orange Coast Analytical using EPA methods 8240 and 8010.
2) Samples from borings B1 through B13 collected on October 28, 1997. Samples from borings B15 through B19 collected December 1 and 2, 1997 (EKI, 1998a).
3) Samples from MW-1 through MW-3 collected in June 1998 (EKI, 1998b).
4) Samples from MW-5 collected in January 1999 (EKI, 1999a).
5) Data summarized from Erler & Kalinowski reports (EKI, 1998a, 1998b, 1999a).

JERVIS B. WEBB COMPANY Law Department

34375 WEST TWELVE MILE ROAD FARMINGTON HILLS MICHIGAN 48331-5624

MICHAEL J. FARLEY
ASSOCIATE GENERAL COUNSEL

TELEPHONE: 1-248-553-1201 FACSIMILE: 1-248-553-1292 E-MAIL: MF0dey@JERVI\$WE88 COM

August 24, 2001

Via Fax and U.S. Mail

Mr. Steven Hariri California Regional Water Quality Control Board 320 4th Street, Suite 200 Los Angeles, CA 90013

Re:

Jervis B Webb Company of California: Soil Closure Workplan and Addendum 5030 Firestone Blvd./ 9301 Rayo Avenue, South Gate, California

RWQCB SLIC File No. 744

Dear Mr. Hariri:

We have received and reviewed your letter dated August 14, 2001 approving implementation of the Workplan subject to certain enumerated conditions. Jervis B Webb Company of California ("Webb") is prepared to accept each condition with the exception of condition 4. For the following reasons, we respectfully ask that you waive the request to install two borings next to the former locations of Tank 1 and Tank 2 on the Rayo property and sample for arsenic and hexavalent chromium.

We question the need to install two borings and sample for arsenic and hexavalent chromium in an area where seven discreet samples were previously taken, and for which closure was granted. As you know, both Tank 1 and Tank 2 were removed and closed in 1996 under the direction of the Los Angeles County Department of Public Works ("LACDPW"). Sampling beneath the bottom of Tank 1 found arsenic levels (2.4 and 2.2 mg/kg) below the industrial PRG of 2.7 mg/kg, and total chromium levels (12 and 11 mg/kg) below the industrial PRG of 450 mg/kg. The total chromium results are also below the industrial PRG for hexavalent chromium of 64 mg/kg.

Tank 2 was actually a four foot deep sump. Following an over excavation to a depth of ten feet, sampling of the sidewalls and bottom of Tank 2 found arsenic levels of 1.6 mg/kg to 3.1 mg/kg, which is functionally the same as the industrial PRG of 2.7 mg/kg. Total chromium (ranging from 7.4 to 16 mg/kg) was below the industrial PRG for total chromium as well as below the industrial PRG for hexavalent chromium.

Not only are the levels of arsenic and chromium low, but these compounds do not readily migrate in soils. Moreover, there is a 3 to 5 foot thick continuous clay layer at 25 feet below ground

surface which forms a barrier to migration. Groundwater is found at 40 feet below ground surface.

The Rayo property is no longer owned by Webb. The former tank locations are beneath a concrete slab inside a large industrial hanger building in an area zoned heavy industrial. Heavy cut metal products and equipment are stored on and around the former tank location by the current owner. This makes access difficult. In addition, there is no guarantee that Webb could obtain an access agreement and conduct the testing in the near term

In sum, prior sampling of Tank 1 and Tank 2 under the direction of the LACDPW found levels of arsenic at or below the industrial PRG and levels of chromium well below industrial PRGs; a 3 to 5 foot thick continuous clay layer underlies the area at a depth of 25 feet which provides a barrier to downward migration and there is a concrete slab covering the area which prevents contact with the soils; the property is not owned by Webb and the owner stacks heavy metal products at the former tank location. Based on these factors, we request withdrawal of condition 4 so that we can proceed promptly to implement the Workplan as modified by the Board.

If you feel you cannot withdraw condition 4, we would like to schedule a meeting to discuss this with the Board. Thank you for your assistance.

Michael J Farley

Associate General Counsel

MJF/sma M9685/1454

California Regional Water Quality Control Board

Los Angeles Region

(50 Years Serving Coastal Los Angeles and Ventura Counties)

Gray Davis Governor

Winston H. Hickox Secretary for Environmental Protection

320 W 4th Street, Suite 200, Los Angeles, California 90013 Phone (213) 576-6600 FAX (213) 576-6640 Internet Address: http://www.swrcb.ca.gov/rwqcb4

August 14, 2001

Mr. Michael Farley Jervis B. Webb Company 34375 West Twelve Mile Road Farmington Hills, MI 48331-5624

WORKPLAN FOR SOIL CLOSURE AND ADDENDUM TO WORKPLAN FOR SOIL CLOSURE – JERVIS B. WEBB COMPANY – 5030 FIRESTONE BOULEVARD, SOUTH GATE (SLIC NO. 744)

Dear Mr. Farley:

The Los Angeles Regional Water Quality Control Board (Regional Board) staff has received and reviewed the Workplan for Soil Closure" (workplan) and "Addendum to Workplan for Soil Closure", dated June 25, 2001 and July 18, 2001, respectively. Based on our review of the information submitted, you are authorized to implement the workplan with the following conditions:

- 1 Please notify the Regional Board at least 10 working days prior to the start of fieldwork.
- 2. Contaminated soil and groundwater generated during drilling and water sampling shall be managed in accordance with appropriate regulations.
- 3 Laboratory reports and method detection limits (MDLs) shall meet the requirements specified in the Regional Board's May 1996 Interim Site Assessment & Cleanup Guidebook, Appendices B and C
- 4 Please install two additional confirmation borings each next to the former location of Tank 1 and Tank 2, respectively. The borings shall be discreetly sampled from five feet below surface to first encountered groundwater. Please analyze soil samples for arsenic and hexavalent chromium by EPA 6000 and 7000 series methods
- 5 Please install an additional confirmation borings next to borings B-15 and B-16. The borings shall be discreetly sampled form five feet below surface to first encountered groundwater. Please analyze soil samples for volatile organic compounds by EPA Method 8260B.
- 6. Confirmation borings CB-1, CB-2 and CB-3 shall be discreetly sampled from five feet below surface to first encountered groundwater. In addition to the proposed EPA Method 8260B analysis for all borings, please analyze soil samples from CB-1 and CB-2 for Title 22 Metals to include hexavalent chromium by EPA 6000 and 7000 series methods from 20 feet and 15 feet below ground surface to first encountered groundwater, respectively.
- 7. Please submit site-specific soil cleanup screening levels in your soil confirmation investigation report, based on site-specific conditions, soil-screening levels shall be determined in accordance with the Regional Board's May 1996 Interim Site Assessment & Cleanup Guidebook.

California Environmental Protection Agency

The energy challenge facing California is real. Every Californian needs to take immediate action to reduce energy consumption

***For a list of simple ways to reduce demand and cut your energy costs, see the tips at: http://www.swrcb.ca.gov/news/echallenge.html

- Please submit a soil confirmation investigation report incorporating all information in previous reports. It must include a site location map, site layout map, historical boring locations, monitoring well locations, groundwater gradient, soil and groundwater isoconcentration contours for each contaminant, tables of contaminants, geologic cross-sections with soil contamination isoconcentrations, and a thorough historical description of all activities at the site to date
- 9. The following cleanup criteria shall apply to the project:
- a. Petroleum hydrocarbons and volatile organic compounds (VOCs) Based on site-specific conditions, soil-screening levels shall be determined in accordance with the Regional Board's May 1996 Interim Site Assessment & Cleanup Guidebook, or the preliminary remedial goals (PRGs) and soil screening levels prepared by the United States Environmental Protection Agency (U.S. EPA). Region IX, whichever is lowest.
- b. Heavy metals and semi-VOCs Based on site-specific conditions, the soluble designated level for constituents of concern shall be determined in accordance with the Designated Level Methodology for Waste Classification and Cleanup Level Determination dated 1986, updated 1989, by Ion Marshak, or the PRGs and soil screening levels prepared by U.S. EPA Region IX, whichever is lowest
- c Risk assessments, including both human health risk assessments and ecological risk assessments shall be conducted in areas where risk-based clean-up levels are established as clean-up criteria. Any such criterion requires approval by Office of Environmental Health Hazard Assessment (OEHHA) or Department of Toxic Substances Control (DTSC) and Regional Board Staff prior to implementation
- d. Please be advised that Total Threshold Limit Concentrations (TTLCs) and Soluble Threshold Limit Concentrations (STLCs) are waste classification criteria typically used for land disposal purposes. Waste classification levels are different from soil and groundwater cleanup levels, which are used for the protection of the groundwater resources and human health.

A report for the soil confirmation investigation must be provided to the Regional Board no later than **October 15, 2001** Please call me at (213) 576-6745, if you have any questions

Sincerely,

S Steven Hariri, PE

Water Resources Control Engineer - D

Site Cleanup I Unit

cc: Gary Cronk, IT Corporation

California Environmental Protection Agency

The energy challenge facing California is real. Every Californian needs to take immediate action to reduce energy consumption

For a list of simple ways to reduce demand and cut your energy costs, see the tips at: http://www.swrcb.cu.gov/news/echallenge.html

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WASHINGTON, D.C.

July 31, 2001

Arthur C. Heath, Ph.D.
Section Chief
California Regional Water Quality Control Board
320 W. Fourth Street, Suite 200
Los Angeles, CA 90013

Re: Jervis B. Webb Company of California ("Webb of California")

City of South Gate

RWQCB LIC File No. 744

Dear Art:

I am writing to thank you, Rebecca Chou and Steve Hairiri for meeting with us on July 11, 2001, and to summarize our understanding of the agreements reached at the meeting and the responsibilities that the Board and Webb of California agreed to pursue with respect to the Webb site.

- The Board agreed that at this time soil closure at the Webb of California site could proceed separate from any possible further work with respect to groundwater at the site. Webb submitted its soil closure work plan on June 25, 2001 and an Addendum to that work plan on July 18, 2001. We are currently waiting for the Board's response to the work plan. IT Corporation has indicated that it can begin field work within approximately one week of receiving approval to proceed with the soil closure work plan.
- The Board understands that Webb of California has already spent more on environmental issues at the site than the expected market price for the property and the importance, from Webb of California's standpoint, in moving ahead with a sale of the property.
- The Board agreed to send out, subject to availability of resources, questionnaires
 to upgradient property owners to gather further information on contamination that
 may be coming from such properties.

- Although the Board staff believes that Webb of California has presented credible
 evidence that contamination under its site may be coming from an offsite source,
 the Board staff would need additional information before it could recommend a
 No Further Action letter ("NFA") with respect to groundwater at the site. Webb of
 California agreed to present to the Board what, if any, further groundwater
 investigation Webb of California may propose to undertake.
- The Board staff does not expect Webb of California to do further groundwater investigation and/or remediation at the site; however, without further data, Board staff is not prepared to recommend an NFA for groundwater for Webb of California at this time.

Please let me know if you have any questions or if you disagree with this summary of the July 11 meeting. Once again, we appreciate your assistance and thank you for taking the time to meet with us.

Yours very truly,

Gene A. Lucero

of LATHAM & WATKINS



California Regional Water Quality Control Board

Los Angeles Region



320 W. 4th Street, Suite 200, Los Angeles, California 90013 Phone (213) 576-6600 FAX (213) 576-6640 Internet Address: http://www.swrcb.ca.gov/~rwqcb4

MEETING ATTENDANCE SHEET

WILE	TING ATTENDANCE SHE	EI .
DATE: 5/3//0/		
SUBJECT: JEANS	WEBS STANK	5 MEGINTO
	8	\$
NAME	ORGANIZATION	PHONE NUMBER
Steven Hariri	RWQCB	213-576-6745
Gara Cronk	IT Corp.	949-660-7511
MIKE SKLASH	DRAGUN CORP.	248-932-0228
hicked Feely	LAW	213-891-1895
Mike Farley	Wess	248-553-1201
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	MEETING NOTE	
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California Regional Water Quality Control Board

Los Angeles Region



320 W. 4th Street, Suite 200, Los Angeles, California 90013 Phone (213) 576-6600 FAX (213) 576-6640 Internet Address: http://www.swrcb.ca.gov/~rwqcb4

MEETING ATTENDANCE SHEET

DATE: // II / O /		(₩)	
SUBJECT: JERUS WEBB STATUS		e , h ege	
	e e	Þ	

NAME	ORGANIZATION	PHONE NUMBER
REBECEA CHOU	RWOCS	213-576-6733
Steven Hariri	RWQCB	213-576-6745
MIKE SKLASH	DRAGUN CORP.	248-932-0228
Gary Cront	IT Corp.	949-660-7511
GENE LUCERO	Latham ? Watkins	213-891-8332
Mike Farley	Wess	248-553-1201
Millar Feeley	von	213-891-7895
ARTHUR HEATH	RWOCB	213-576-6725
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FAX Transmission

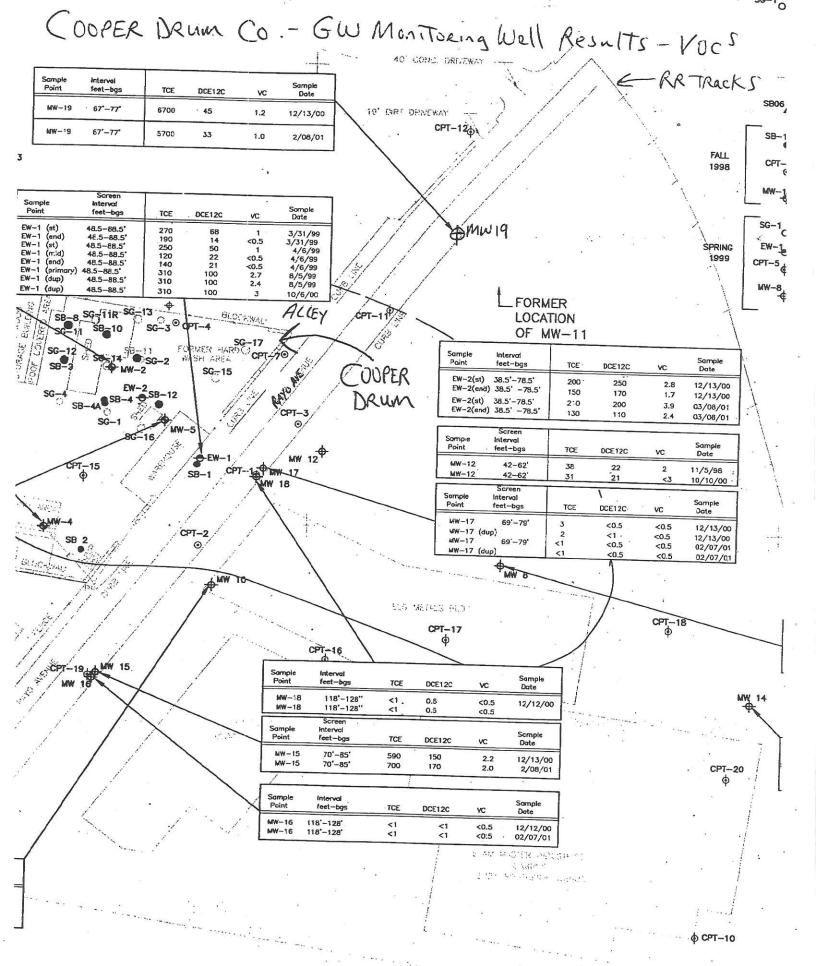
	1	
To:	Name	Steven HARIRI
2 .	Organization	Steven HARIRI LA-RWacB
	Mail Stop	
iei 8 - 8	Fax No.	2135766717
	Verification No.	
From:	Name	ERIC YUNKER
	Address	U.S. Environmental Protection Agency Region 9, Superfund Division 75 Hawthorne Street San Francisco, CA 94105
,	Phone No.	415 744 2245
9	Fax No.	(415) 744-1796 or 2180
Date	5-29-0) /
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California Regional Water Quality Control Board

Los Angeles Region

Gray Davis Governor

320 W. 4th Street, Suite 200, Los Angeles, California 90013 Phone (213) 576-6600 FAX (213) 576-6640 Internet Address: http://www.swrcb.ca.gov/~rwqcb4

September 18, 2000

Mr. Eli Stanesa Jervis B. Webb Company 34375 West Twelve Mile Road Farmington Hills, MI 48331-5624

QUARTERLY GROUNDWATER MONITORING REPORT – JERVIS B. WEBB COMPANY – 5030 FIRESTONE BOULEVARD, SOUTH GATE (SLIC NO. 744)

Dear Mr. Stanesa:

The Los Angeles Regional Water Quality Control Board (Regional Board) has received and reviewed the Quarterly Progress Report (report), dated May 15, 2000. Based on review of the information submitted, the Regional Board has the following comments:

- 1. Submit a work plan for additional groundwater investigation to fully delineate groundwater contamination.
- 2. Please provide a map showing the proposed locations for additional monitoring wells, tables depicting the analytical methodology, text explaining the rationale for the number and location of additional wells. Direct push technology may be used to delineate groundwater contamination prior to well installation.
- 3. The Regional Board must be contacted at least 10 days prior to the start of any fieldwork.
- 4. Contaminated soil and groundwater generated during drilling and water sampling shall be managed in accordance with appropriate regulations.
- 5. Monitoring well construction and development must comply with the requirements presented in the California Department of Water Resources' "California Well Standards" Bulletin 74-90.
- 6. A California licensed land surveyor must survey all groundwater monitoring wells to a County maintained benchmark. The survey report, signed by the licensee, shall be included in the assessment report.
- 7. Future quarterly groundwater monitoring reports must include groundwater contours depicting groundwater flow direction and gradient information. Also, include a dissolved phase contaminant isoconcentration contour map for each constituent.
- 8. Laboratory reports and method detection limits (MDLs) shall meet the requirements specified in the Regional Board's May 1996 Interim Site Assessment & Cleanup Guidebook, Appendices B and C.

- 9. We are enclosing the following requirements for your information. All field activities shall comply with these requirements:
 - General Requirements for Subsurface Investigation
 - Requirements for Groundwater Investigation
- 10. Pursuant to State Water Resources Control Board Resolution No. 92-49, under Water Code Section 13304, all fieldwork related to well installation must be conducted by, or under the direct responsible supervision of, a registered geologist or licensed civil engineer. All technical documents submitted to the LARWQCB must be reviewed and signed and/or stamped by a California registered geologist, a California registered certified specialty geologist, or a California registered civil engineer with at least five years hydrogeologic experience.
- 11. The California Business and Professions Code Sections 6735, 7835, and 7835.1 require that engineering and geologic evaluations and judgements be performed by or under the direction of registered professionals. Therefore, all work must be performed by or under the direction of a registered geologist or registered civil engineer. A statement is required in the report that the registered professional in responsible charge actually supervised or personally conducted all the work associated with the project.
- 12. Pursuant to changes to the California Health and Safety Code (Section 25299.37.2) and Division 7 of the Porter Cologne Water Quality Control Act under AB 681, the Regional Board is required to notify all current fee title holders for the subject site of the planned action. As the identified current primary or active responsible party for corrective action and/or cleanup at the site, we are requesting that you provide us with a complete mailing list of all record fee title holders for the subject site. Therefore, please provide the name, mailing address, and telephone number for all record fee title holders for the subject site with a copy of the county record of current ownership, available from the County Recorder's Office, or complete the attached Certification Declaration form and submit it to our office. Please submit the required information by the due date of the workplan.
- 13. You are required to submit information to show the depth to the drinking water aquifer, and a scaled map showing the locations of the production wells and surface water bodies within a one mile radius of the site. The production well information must include the following: the well owner, the well identification number, well construction detail, and the status of the well. In addition, you are required to discuss the local geologic formations and lithology, which will allow this Regional Board to assess the vulnerability of the nearby drinking water supply wells, and determine any potential contaminant migration pathways to deeper groundwater zones. Please include this information along with your upcoming workplan.

The groundwater investigation workplan must be provided to the Regional Board no later than **November 17, 2000**. In the event that groundwater contamination is not fully delineated during this phase of work, a workplan for a complete groundwater investigation will be required. Please call me at (213) 576-6745, if you have any further questions.

Sincerely,

S. Steven Hariri, P.E.

Associate Water Resources Control Engineer

Site Cleanup Unit I

Enclosures:

- 1. General Requirements for Subsurface Investigation
- 2. Requirements for Groundwater Investigation
- 3. Certification Declaration form

cc: Steven Miller, Erler & Kalinowski, Inc.



California Legional Water Quality Control Board

Los Angeles Region



I Newson

320 W. 4th Street, Suite 200, Los Angeles, CA 90013 Phone (213) 576-6600 FAX (213) 576-6640

RECORD OF COMMUNICATION	PHONE CALL DISCUS CONFERENCE OTHER	AND
TO: DAWN STAVFFER tel ECOLOGY & ENV. (415)981-2811	FROM: STEVEN HARIRI tel	DATE: 9/5/00
SUBJECT: SITE STATE	US	FILE NO: 744
Summary of Conversation:		
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Conclusions, Action taken or required:		- 18
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CHICAGO
FRANKFURT
HAMBURG
HONG KONG
LONDON
LOS ANGELES

MOSCOW

NEW JERSEY

Latham & Watkins

ATTORNEYS AT LAW
WWW.LW.COM

NORTHERN VIRGINIA
ORANGE COUNTY
SAN DIEGO

2 SAN FRANCISCO

SILICON VALLEY

NEW YORK

τοκγο

May 23, 2001

VIA MESSENGER

Mr. Steven Hariri Site Cleanup Unit California Regional Water Quality Control Board Los Angeles Region 320 4th Street, Suite 200 Los Angeles, CA 90013

Re: Jervis B. Webb Company of California

5030 Firestone Blvd./ 9301 Rayo Avenue, South Gate, California

RWQCB SLIC File No. 744 (the "Site)

Dear Mr. Hariri:

On behalf of Jervis B. Webb of California, we are submitting two documents concerning the Site. First, we are forwarding two copies of the Quarterly Progress Report for January through March 2001, dated 30 April 2001, prepared by EKI.

Second, as preparation for sale of the Firestone property, IT Corporation and Dragun Corporation conducted an independent, comprehensive review of the hydrogeologic, soil gas, soil chemistry and groundwater chemistry site data. After extensive review of available data, IT/Dragun have concluded that groundwater contamination beneath the Site is not related to Site activities but comes from an upgradient, off-site source. This conclusion is significant, and we are therefore forwarding two copies of the IT/Dragun Groundwater and Soil Evaluation Report dated May 22, 2001 for your review.

As you know, the 5030 Firestone Blvd. property is Webb of California's sole asset and we believe we may be close to a sale of the property. Accordingly, we are requesting a meeting with you and Rebecca Chou to discuss (1) a plan for confirmatory soil sampling as we seek soil closure for the Site and (2) IT/Dragun's analysis of the off-site origin of groundwater contamination under the Site, which we believe strongly supports a conclusion by the Board that Webb of California is not responsible for groundwater contamination under the Site and should not be required to conduct further groundwater investigation or remediation activities a the Site. We will call you next week to schedule a convenient day and time for such a meeting.

Thank you for your continued courtesy.

Yours very truly,

Michael Scott Feeley

of LATHAM & WATKINS

Enclosures



California Regional Water Quality Control Board

Los Angeles Region



320 W. 4th Street, Suite 200, Los Angeles, California 90013 Phone (213) 576-6600 FAX (213) 576-6640 Internet Address: http://www.swrcb.ca.gov/~rwqcb4

MEETING ATTENDANCE SHEET

DATE: 2/08/01		• 8					
SUBJECT: JEMS O	SEBB SITE STATUS	es _t ev v v v e					
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NAME	ORGANIZATION	PHONE NUMBER					
		Le.					
Steven Hariri	RWQCB	213-576-6745					
KEBECCA CHOU	V	213-576 - 6733					
Michael Feeley	batrant hatkins	213-891-7895					
Michael Parlly	Vervis B. West	248-553-1201					
SIEVE CHAMBERS	ERLER PRALINOWSKI, INC.	310-314-8855					
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California R gional Water Quality Control Board Los Angeles Region



320 W. 4th Street, Suite 200, Los Angeles, CA 90013 Phone (213) 576-6600 FAX (213) 576-6640

RECORD OF COMMUNICATION	PHONE CALL DISCUSSION FIELD TRIP CONFERENCE OTHER (specify)							
TO: STAK CHAMBEUS	FROM: STELEN HARIRI tel	DATE: 1/18/01						
SUBJECT: WORKPLAN FOR S	DIVE	FILE NO: 744						
Summary of Conversation:								
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California Regional Water Quality Control Board

Los Angeles Region



320 W. 4th Street, Suite 200, Los Angeles, California 90013
Phone (213) 576-6600 FAX (213) 576-6640
Internet Address: http://www.swrcb.ca.gov/~rwqcb4

May 18, 1999

Mr. Eli Stanesa Jervis B. Webb Company 34375 West Twelve Mile Road Farmington Hills, MI 48331-5624

JERVIS B. WEBB COMPANY, 5030 FIRESTONE BOULEVARD, SOUTH GATE, SOIL REMEDIATION ACTIVITIES (SLIC NO. 744)

Dear Mr. Stanesa:

We have received and reviewed your consultant's "Work Plan for Clarifier Removal and Soil Remediation by Soil Vapor Extraction" dated April 14, 1999, submitted for the above-referenced site. The report indicates that two distinct soil vadose zones, a shallow zone (approximately 10 to 25 feet bgs) and a deeper zone (approximately 25 to 45 feet bgs), separated by a 1 to 5 foot clay layer at approximately 25 feet bgs exist underlying the subject site. The report also indicates that both zones are impacted by volatile organic compounds (VOC), primarily TCE and PCE, and proposes to remediate the contaminated soil through the use of a soil vapor extraction system (SVE). Your consultant proposes to install three SVE wells and two vacuum monitoring points in the shallow zone and one SVE well and two vacuum monitoring points in the deeper zone. We have reviewed the subject submittal and you are authorized to proceed with the soil remediation activities proposed subject to the following modifications:

- Upon completion of the pilot testing activities, please provide us with the actual radius of influence data for the SVE wells and revise the site map accordingly. Additional soil vapor extraction wells in both the shallow and deeper zones may need to be installed in order to capture the entire on and off-site soil contamination plume.
- Your consultant indicates that soil gas samples will be collected immediately after system startup and following the second, fourth, fifth, and sixth months of SVE operation. Soil gas samples should also be collect prior to system startup in order to collect baseline soil gas information.

Regarding the groundwater, as previously indicated in our letter dated September 4, 1998, a quarterly groundwater sampling and monitoring program must be developed for all monitoring wells located at the subject site. A quarterly groundwater monitoring and sampling plan shall be submitted to this Regional Board by June 28, 1999. We also recommend that you consider conducting groundwater remediation activities.

Mr. Stanesa

-2-

May 18, 1999

If you have any questions regarding this matter, please contact me at (213) 576-6738.

Sincerely,

ANA TOWNSEND

Sanitary Engineer Associate

Site Cleanup Unit

Steven Miller, Erler & Kalinowski, Inc. CC:



October 8, 2001

California Regional Water Quality Control Board Los Angeles Region 320 West 4th Street, Suite 200 Los Angeles, CA 90013 ATTN: Steven Hariri

RE:

Explanation of SPLP Extraction Method

Soil Closure Report

Jervis B. Webb of California

South Gate, CA

Dear Mr. Hariri:

Per your request, I am writing to provide a further explanation of the SPLP extraction method used for the Jervis B. Webb Soil Closure Report submitted on October 4, 2001. I spoke with Larry Lem, Laboratory Director at Calscience Environmental Laboratories, who performed the SPLP extraction and testing for us. Mr. Lem stated that the SPLP method (EPA Method 1312) uses a 20:1 dilution (20 times the volume of water to soil) in the leaching process. Note: a 10-fold dilution is used in other leaching methods such the TCLP and the STLC. The concentration that is reported by the lab is the exact concentration of the leachate (no modification made for dilution). Therefore the concentration of the leachate can be directly compared to the MCL. In our case, the 10 ug/l from sample CB-4 @ 30 feet can be compared to the MCL for TCE of 5 ug/l. Note that because of the 20-fold dilution, the maximum concentration of the leachate (if all VOCs in the sample were leachable) would be 31 ug/l (630 divided by 20). Since our concentration was 10 ug/l, about 1/3 of the VOCs in the sample are leachable (and 2/3 are not leachable).

The SPLP method utilizes de-ionized water that is modified to a pH of 5.5 using sulfuric acid. This method is the least aggressive of the leaching methods. The other methods use a different acid and lower pH.

I trust this information will be of use to you. Please call me at (949) 660-7511 if I can be of further assistance.

Sincerely,

IT Corporation

Gary Cronk, P.E. Project Manager

Cc:

Mike Farley, Jervis B. Webb

Michael Feeley, Latham & Watkins

Corporation

247 Michelson Drive, Suite 200
vine, CA 92612-1692

Tel. 949.261.6441 Fax. 949.474.8309

A Member of The I

guarterly gw rpts through 7/01. Erlor & Kalinowski, Inc.

Additional Groundwater Investigation and Quarterly Monitoring Report for October to December 1998

Jervis B. Webb Company Property 5030 Firestone Boulevard South Gate, California

13 January 1999

Erler & Kalinowski, Inc.

Consulting Engineers and Scientists 2951 28th Street, Suite 1020 Santa Monica, California 90405 (310) 314-8855

TABLE 1 Well Construction Details

Additional Groundwater Investigation and

Quarterly Monitoring Report for October to December 1998

Jervis B. Webb Company, 5030 Firestone Boulevard, South Gate, California

Well ID	Installation Date	Boring Depth (ft bgs)	Boring Diameter (inches)	Casing Diameter (inches)	Perforated Interval (ft bgs)	Casing	Screen Material	Perforation Size (inches)	Filter Pack Material	Surface Completion
Well ID				1 1	40 - 70	PVC	PVC	0.010	#1C Lonestar	12" EMCO
MW-1	2/25/98	73	10-1/4	4	40 - 70	PVC	PVC	0.010	#1C Lonestar	
MW-2	2/25/98	73	10-1/4	4		PVC	PVC	0.010	#1C Lonestar	12" EMCO
MW-3	2/25/98	73	10-1/4	4	40 - 70	PVC	PVC	0.010	#1C Lonestar	12" EMCO
MW-4	10/28/98	71	10-1/4	4	40 - 70		PVC	0.010	#1C Lonestar	
MW-5	10/28/98	71	10-1/4	4	40 - 70	PVC	PVC	0.010	# 10 Londotta	10 22 E. C. 7 VIII.

NOTES:

Abbreviations:

ft bgs = feet beneath the ground surface

PVC = polyvinyl chloride

TABLE 5 Analytical Results for Monitoring Well Groundwater Samples

Additional Groundwater Investigation and Quarterly Monitoring Report for October to December 1998

Jervis B. Webb Company, 5030 Firestone Boulevard, South Gate, California

		T		Analyte Concentration										
	Sample	Sample	Benzene	Toluene ·	Xylenes	1,1-DCA	1,2-DCA	1,1-DCE	c-1,2-DCE	t-1,2-DCE	PCE	TCE	TDS	
	4-600-1712-00-1-1712-00-1			(ug/L)	(ug/L)	(ug/L)	(ug/L)	(ug/L)	(ug/L)	(ug/L)	(ug/L)	(ug/L)	(mg/L)	
Well ID	Number	Date	(ug/L)	(ug/L)	(ug/L)	(49/1/			_		140	24,000		
MW-1	MW-1-0304	3/4/98	<0.5	<0.5	<0.5	<0.5	<0.5	220	130	<0.5	140			
101.00	MW-1-0304DUP	3/4/98	<0.5	<0.5	<0.5	<0.5	<0.5	210	150	<0.5	160	25,000		
	MW-1-0520	5/20/98	<125	<125	<125	<125	<125	160	130	<125	<125	24,000	1,500	
	ACTUAL OF CHICAGOSCO	11/5/98	<125	<125	<125	<125	<125	140	160	<125	170	28,000		
	MW-1		<0.5	<0.5	<0.5	13	<0.5	34	65	<0.5	<0.5	2,700		
MW-2	MW-2-0304	3/4/98	100,000,000,000		<10	14	<0.5	38	68	<10	<10	3,000	2,500	
	MW-2-0520	5/20/98	<10	<10	0000000 10	13	<10	36	68	<10	<10	3,200	2,600	
	MW-2	11/5/98	<10	<10	<10	_	<0.5	82	200	<0.5	<0.5	2,800		
MW-3	MW-3-0304	3/4/98	<0.5	13	<0.5	14		58	230	15	<10	2,800	1,100	
	MW-3-0520	5/20/98	<10	<10	<10	13	<0.5	256		18	<10	2,300		
	MW-3	11/5/98	<10	<10	<10	11	<10	66	240			6.7	3,600	
MW-4	MW-4	11/5/98	<0.5	<0.5	<0.5	<0.5	<0.5	<0.5	0.67	<0.5	<0.5		-	
MW-5	MW-5	11/5/98	<25	<25	<25	<25	<25	42	380	30	<25	5,000	-	
10100-0	MW-5-DUP	11/5/98	<25	<25	<25	<25	<25	40	360	29	<25	4,800		
	California MCL	1 170/00	1	150	1750	5	0.5	6	6	10	5	5		

NOTES: Abbreviations:

xylenes = total xylene isomers

1,1-DCA = 1,1-dichloroethane

1,1-DCE = 1,1-dichloroethene

1,2-DCA = 1,2-dichloroethane

c-1,2-DCE = cis-1,2-dichloroethene

t-1,2-DCE = trans-1,2-dichloroethene

VOCs = volatile organic compounds

PCE = tetrachloroethene

TCE = trichloroethene

1,1,1-TCA = 1,1,1-trichloroethane

TDS = total dissolved solids

ug/L = micrograms per liter

mg/L = milligrams per liter

-- indicates not analyzed

1. Analyses performed by Orange Coast Analytical, Inc. using EPA Method 8260 for VOCs and EPA Method 160.1 for TDS.

2. California maximum contaminant levels ("MCLs") are as reported in the Drinking Water Standards and Health Advisories Table by U.S. EPA Region IX, dated June 1998.

TABLE 4 Analytical Results for Direct-Push Groundwater Samples

Additional Groundwater Investigation and Quarterly Monitoring Report for October to December 1998 Jervis B. Webb Company, 5030 Firestone Boulevard, South Gate, California

PIPP	Sample	Depth						Compounds	s - EPA M	ethod 8260	(ug/L)	+12 DCE	PCE	TCE
Location	Date	(ft bgs)	Acetone	MEK	Benzene	Toluene	Xylenes	1,1-DCA				t-1,2-DCE		<0.5
CPT-1	10/1/98	55	170	4.6	1.6	< 0.5	1.6	< 0.5	<0.5	<0.5	< 0.5	<0.5	< 0.5	
		95	8.1	<1	< 0.5	< 0.5	< 0.5	< 0.5	5.3	<0.5	< 0.5	<0.5	<0.5	<0.
CPT-1	10/1/98	24000000	300	3.5	<1	1.1	<1	<1	<1	<1	<1	<1	<1	1.6
CPT-2	10/1/98	55	#19000034500C		0.58	0.55	0.66	< 0.5	< 0.5	< 0.5	2.6	< 0.5	< 0.5	6.3
CPT-3	10/1/98	55	170	2.7			1.2	1.2	<1	4.1	11	<1	<1	220
CPT-4A	10/1/98	55	95	2.2	<1	1.1		1.1	<1	3.4	10	<1	<1	200
CPT-4B	10/1/98	55	80	8.4	<1	<1	<1		<13	<13	110	<13	<13	3,800
CPT-5	10/1/98	55	480	<25	<13	<13	<13	<13			130	<100	110	35,000
CPT-6	10/2/98	55	<400	<200	<100	<100	<100	240	<100	<100		<125	<125	27,000
CPT-7	10/2/98	55	<500	<250	<125	<125	<125	160	<125	<125	190			140
CPT-8	10/2/98	55	16	<1	< 0.5	< 0.5	< 0.5	1.4	<0.5	6.7	11	1.3	<0.5	
04-040 540 50M		55	490	7.7	<1	<1	<1	<1	<1	<1	<1	<1	<1	9.1
CPT-9	10/2/98	55	730	1.7			. ==0		0.5	6	6	10	5	5
Ca	alifornia MC	CL	none	none	1	150	1,750	5	0.5					

NOTES: Abbreviations: PIPP = Push-In Plastic Piezometer

ft bgs = feet below ground surface

ug/L = micrograms per liter

MEK = Methyl ethyl ketone (2-butanone)

Xylenes = Total xylenes

1,1-DCA = 1,1-Dichloroethane

1,2-DCA = 1,2-Dichloroethane

1.1-DCE = 1,1-Dichloroethene

c-1,2-DCE = cis-1,2-Dichloroethene

t-1,2-DCE = trans-1,2-Dichloroethene

PCE = Tetrachloroethene

TCE = Trichloroethene

1. Sample CPT-4B is a duplicate of sample CPT-4A.

2. Chemical analyses were performed by Orange Coast Analytical, Inc. in Tustin, California

3. California maximum contaminant levels ("MCLs") are as reported in the Drinking Water Standards and Health Advisories Table by U.S. EPA Region IX, dated June 1998. "none" indicates that no MCL (California or federal) has been established.

Erler & Kalinowski, Inc.

21 October 1998

Consulting Engineers and Scientists
Santa Monica Business Park 26 PM 1: 13
2951 28th Street, Suite 1020
Santa Monica, California 90405 ECONAL WATER
(310) 314-8855 (JUALITY CONTROL BOARD
Fax (310) 314-8860 LOS ANGELES REGION

Ms. Ana Veloz-Townsend Site Cleanup Unit California Regional Water Quality Control Board Los Angeles Region 101 Centre Plaza Drive Monterey Park, California 91754-2156

Subject:

Transmittal of Results for Additional Groundwater Investigation and Proposed Well Installation at the Jervis B. Webb Company Property at 5030 Firestone Boulevard, South Gate, California (RWQCB SLIC File No. 744; EKI 961025.02)

Dear Ms. Veloz-Townsend:

On behalf of Jervis B. Webb Company of California ("Webb"), Erler & Kalinowski, Inc. ("EKI") is pleased to transmit this summary of results for the recent groundwater investigation and proposal for well installation at the Jervis B. Webb Company property located at 5030 Firestone Boulevard in South Gate ("Site"). The additional groundwater investigation activities were performed in accordance with EKI's, *Project Tasks, Schedule, and Work Plan for Additional Groundwater Investigation and Quarterly Groundwater Monitoring at the Jervis B. Webb Company Property* ("Sampling Plan"), dated 29 September 1998.

Results of PIPP Groundwater Sampling and CPT Investigation

On 1 and 2 October 1998, Holguin, Fahan & Associates, Inc. ("HFA") completed direct-push sampling of groundwater at nine soil boring locations at the Webb property and Reliable Steel Building Products, Inc. ("Reliable Steel") property located at 9301 Rayo Avenue. Samples of groundwater were collected at each location using a Push-in-Plastic-Piezometer ("PIPP"). At one location (CPT-1), groundwater samples were collected at two depths. The locations of these CPT borings are shown on Figure 1, attached. The results of laboratory analyses of groundwater samples are summarized in Table 1.

As proposed in the Sampling Plan, a complete report describing the CPT investigation will be incorporated into a report describing the well installation and quarterly groundwater monitoring activities. This report will be submitted to the RWQCB by 15 December 1998.

Letter to Ms. Veloz-Town and Regional Water Quality Control Board 21 October 1998 Page 2 of 2

Well Installation and Development

We propose to install two new groundwater monitoring wells on the Reliable Steel property. The proposed locations of these wells are shown on Figure 1. In accordance with the California Regional Water Quality Control Board, Los Angeles Region ("RWQCB") letter to Webb dated 4 September 1998, one well (MW-4) will be installed at the south end of the groundwater investigation area, near Rayo Avenue. We also propose to install a well (MW-5) at the northeastern corner of the Reliable Steel Property (see Figure 1).

We currently plan to complete well installation during the last week of October 1998. Well development and groundwater sampling are planned for the first and second weeks of November 1998. Quarterly groundwater monitoring will include sampling of groundwater from the three existing wells at the Site (MW-1 through MW-3) and the two proposed wells.

Please call if you have any questions or comments regarding the above.

Very truly yours,

ERLER & KALINOWSKI, INC.

Steven G. Miller, P.E.

(CE, Cert. 43419)

Project Manager

cc: Mr. Eli Stanesa, Jervis B. Webb Company

hom with

TABLE 1
PIPP Groundwater Detections

Jervis B. Webb Company 5030 Firestone Boulevard South Gate, California

PIPP	Sample	Depth	•	Volatile Organic Compounds - EPA Method 8260 (ug/L)										
Location	Date	(ft bgs)	Acetone	Ben	1,1-DCA	1,2-DCA	1,1-DCE	c-1,2-DCE	t-1,2-DCE	MEK	PCE	TCE	Tol	Xylenes
CPT-1	10/1/98	55	170	1.6	<0.5	<0.5	<0.5	<0.5	<0.5	4.6	<0.5	<0.5	<0.5	1.6
CPT-1	10/1/98	95	8.1	< 0.5	< 0.5	5.3	<0.5	<0.5	< 0.5	<1	<0.5	<0.5	< 0.5	<0.5
CPT-2	10/1/98	55	300	<1	· <1 '	<1	<1	<1	<1	3.5	<1	1.6	1.1	<1
CPT-3	10/1/98	55	170	0.58	<0.5	< 0.5	< 0.5	2.6	< 0.5	2.7	< 0.5	6.3	0.55	0.66
CPT-4A	10/1/98	55	95	<1	1.2	<1	4.1	11	<1	2.2	<1	220	1.1	1.2
CPT-4B	10/1/98	55	80	<1	1.1	<1	3.4	10	<1	8.4	<1	200	<1	<1
CPT-5	10/1/98	55	480	<13	<13	<13	<13	110	<13	<25	<13	3,800	<13	<13
CPT-6	10/2/98	55	<400.	<100	240	<100	<100	130	<100	<200	110	35,000	<100	<100
CPT-7	10/2/98	55	<500	<125	160	<125	<125	190	<125	<250	<125	27,000	<125	<125
CPT-8	10/2/98	55	16	<0.5	1.4	< 0.5	6.7	11	1.3	<1	<0.5	140	< 0.5	< 0.5
CPT-9	10/2/98	55	490	<1	· <1	<1	<1	<1	<1	7.7	<1	, 9.1	<1	<1

NOTES: Abbreviations:

PIPP = Push-In Plastic Piezometer

ft bgs = feet below ground surface

ug/L = micrograms per liter

Ben = Benzene

1,1-DCA = 1,1-Dichloroethane

1,2-DCA = 1,2-Dichloroethane

1,1-DCE = 1,1-Dichloroethene

1,2-DCE = 1,2-Dichlorothene (total)

c-1,2-DCE = cis-1,2-Dichloroethene

t-1,2-DCE = trans-1,2-Dichloroethene

MEK = Methyl ethyl ketone (2-butanone)

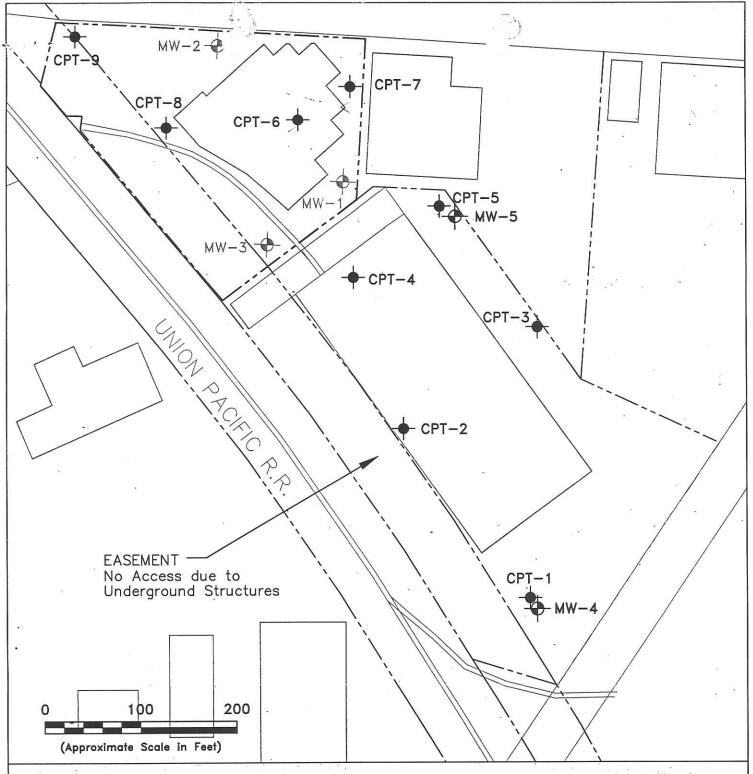
PCE = Tetrachloroethene

TCE = Trichloroethene

Tol = Toluene

Xylenes = Total xylenes

- 1. Sample CPT-4B is a duplicate of sample CPT-4A.
- 2. All results shown are in units of micrograms per liter (ug/L).



LEGEND





Existing Groundwater Monitoring Well

Notes:

1. All locations are approximate.

Erler & Kalinowski, inc.

Site Map Showing Locations of CPT Borings and Proposed Groundwater Monitoring Wells Jervis B. Webb Company South Gate, CA

October 1998 EKI 961025.02

Figure 1

Peter M. Rooney Secretary for Environmental Protection

California R gional Water Quality Control Board

Los Angeles Region



Internet Address: http://www.swrcb.ca.gov 101 Centre Plaza Drive, Monterey Park, California 91754-2156 Phone (323) 266-7500 • FAX (323) 266-7600

September 4, 1998

Mr. Eli Stanesa Jervis B. Webb Company 34375 West Twelve Mile Road Farmington Hills, MI 48331-5624

JERVIS B. WEBB COMPANY, 5030 FIRESTONE BOULEVARD, SOUTH GATE - ADDITIONAL SITE ASSESSMENT ACTIVITIES (SLIC NO. 744)

We have received and reviewed your consultant's "Phase II Groundwater Investigation Report" dated June 30 1998, submitted for the above-referenced site. The report transmits the results from the most recent site assessment activities completed, which includes the results from the installation of the three groundwater monitoring wells and results from soil matrix and groundwater samples collected, from the three new wells and two off-site wells at the subject site.

Analyses of the soil matrix samples collected during previous phases of site assessment activities indicated that soil contaminated with volatile organic compounds (VOC) at concentrations exceeding our cleanup levels have been detected down to the groundwater table, and is considered a continuing threat to the underlying groundwater quality. Groundwater underlies the subject site at approximately 44 feet below ground surface. Analyses of the groundwater samples collected during this phase of site assessment activities from 3 on-site and 2 off-site groundwater monitoring wells have detected VOCs with maximum concentrations of 24,000 μg/L (TCE), 230 μg/L (cis-1,2-DCE) and 160 μg/L (1,1-DCE).

Based on the information submitted to date, we have determined that the concentrations detected in the underlying soil and groundwater exceed allowable levels and that the VOC contaminated soil is a continuing source of groundwater contamination and needs to be remediated. Regarding the groundwater, a quarterly groundwater sampling and monitoring program must be developed for all groundwater monitoring wells located at the subject site. Furthermore, additional groundwater data needs to be collected, primarily up and down-gradient of the source area in order to delineate the extent of the groundwater contamination plume. At a minimum, a groundwater monitoring well shall be installed down-gradient of the source area, preferably near where the former Dial wells were located, in order to monitor the condition of the plume migrating away from the site.

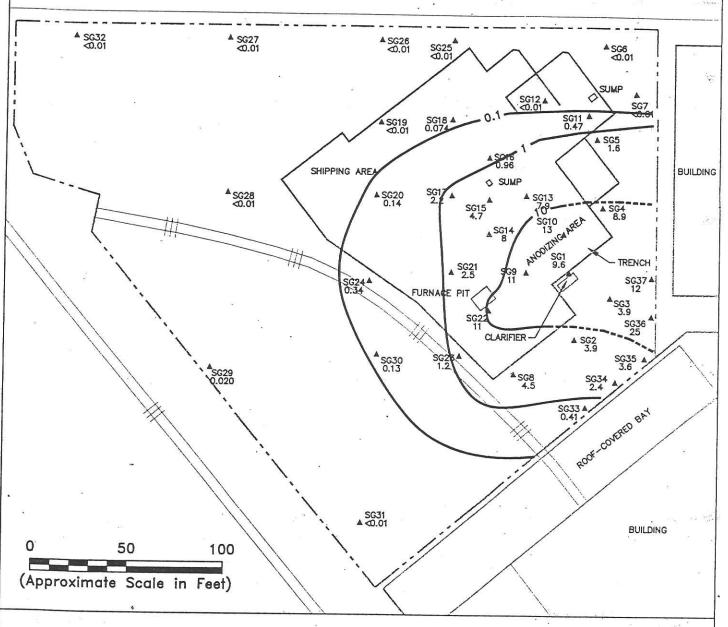
The sampling plan for an additional groundwater investigation, including a schedule for quarterly groundwater sampling and preparation of a workplan for soil remediation activities shall be submitted to this Regional Board by **September 30, 1998**, for our review. The need to remediate the underlying groundwater will be determined following the review and analysis of the additional groundwater data obtained from the well installation and quarterly groundwater sampling activities.

If you have any questions regarding this matter, please contact Ana Veloz-Townsend at (323) 266-7590.

J.E. ROSS, Unit Chief Site Cleanup Unit

cc: Steven Miller, Erler & Kalinowski, Inc.

FIRESTONE BOULEVARD



LEGEND

SOIL GAS SAMPLING LOCATION

PROPERTY LINE/BOUNDARY

BUILDING

RAILROAD SPUR

Erler & Kalinowski, Inc.

Concentrations of TCE Detected in Shallow Soil Gas

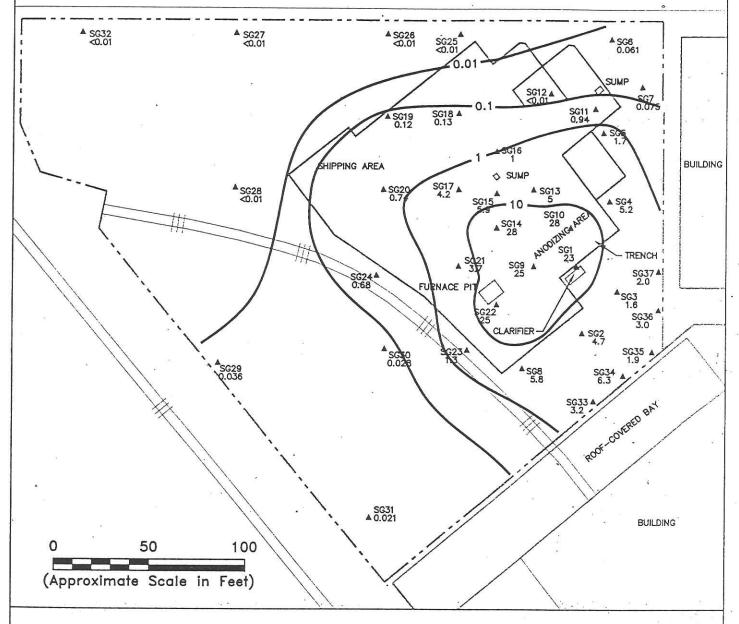
Notes:

- 1. All locations are approximate.
- 2. Soil gas concentration contours in units of micrograms per liter by volume in air.

Jervis B. Webb Company South Gate, CA February 1998 EKI 961025.02

Figure 4

- FIRESTONE BOULEVARD



LEGEND

SOIL GAS SAMPLING LOCATION

PROPERTY LINE/BOUNDARY

BUILDING

RAILROAD SPUR

Erler & Kalinowski, Inc.

Concentrations of PCE Detected in Shallow Soil Gas

Jervis B. Webb Company South Gate, CA February 1998 EKI 961025.02

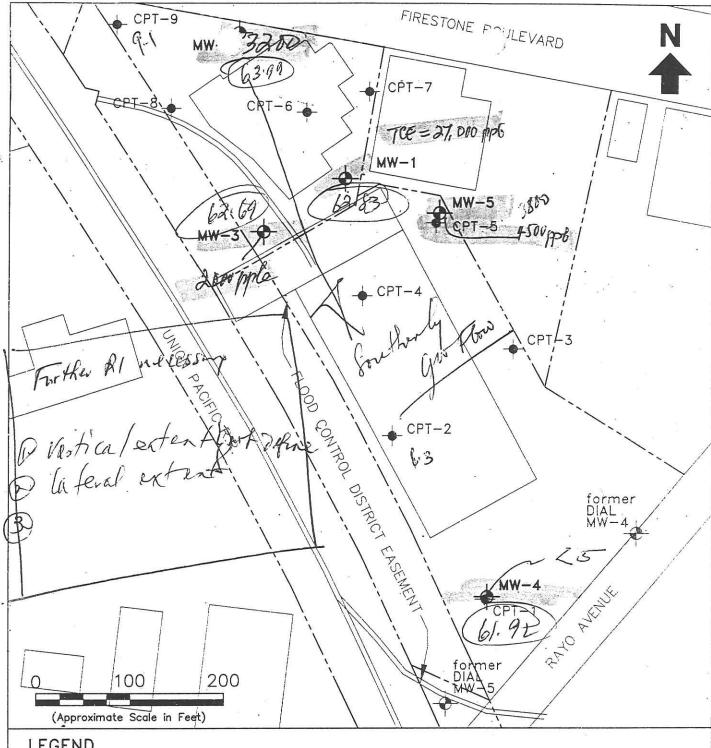
Figure 5

Notes:

1. All locations are approximate.

2. Soil the concentration contours in units of microscoper liter by volume in air:

1191



LEGEND



Groundwater Monitoring Well with Groundwater Elevation (msl)



Former DIAL Monitoring Well PIPP Groundwater Sample Location Property Line/Boundary

Erler & Kalinowski, Inc.

Monitoring Well Locations

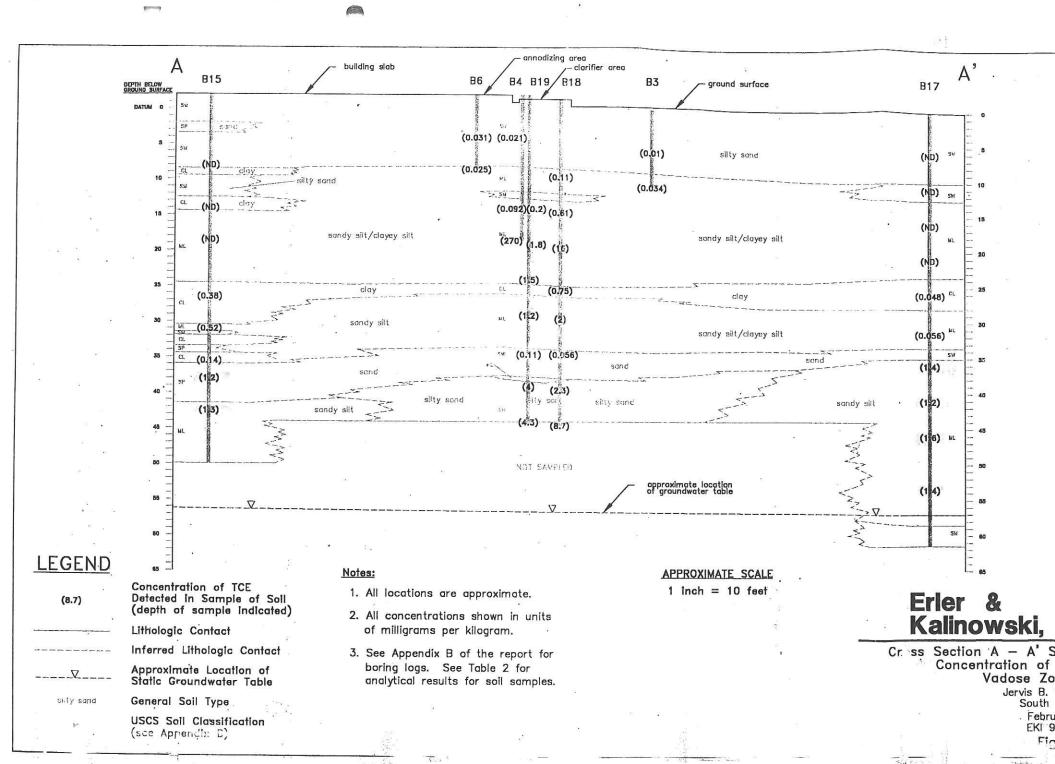
Notes:

1. All locations are approximate. .

Information related to PIPP groundwater sampling and monitoring at the former DIAL wells is provided in <u>Additional Groundwater</u> <u>Investigation and Quarterly Monitoring Report</u>, by Erler & Kalinowski, Inc., dated 13 January 1999 and <u>Adjacent Property Review</u> report, by Emcon Associates, dated 2 November 1995, respectively.

Jervis B. Webb Company South Gate, California June 1999 EKI 961025.02

Figure 2



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3.0 REMOVAL ASSESSMENT CRITERIA — NCP EVALUATION

Use the following criteria to determine if the site should be referred to EPA's Removal Section. If the answer to any question is yes, get EPA concurrence for the decision. If all answers are no, go to Section 4. If a question cannot be answered, explain why in the Comments section below.

ques	stion cannot be answered, explain why	in the Comments seemen		
1.	Is there actual or potential exposure to or the food chain from hazardous substantaminants?	[]Yes	∑ No	
2.	Is there actual or potential contamination sensitive ecosystems?	Yes	. [] No	
3.	Are hazardous substances, pollutants, barrels, tanks, or other bulk storage countries of release?	[]Yes	PNO	
4.	Are there high levels of hazardous sub contaminants is soils largely at or nea migrate and affect populations or the	environment?	[]Yes	∤ No
5.	Could weather conditions cause haza or contaminants to migrate or be released.	irdous substances, pollutants,	[]Yes []Yes	DPN0 My No
6.	Is there a threat of fire or explosion?		[] res	Millo
7.	Are there appropriate Federal or Stat	ilease:	Yes	[] No
8.	Are there other situations or factors v	which may pose threats to public	[]Yes	No [م﴿
0.	health, welfare, or the environment?	[]Yes	[] No	
9	< Reserved >	a secundwater	F 85.	
1	O. For the situation where there appear contamination problem, is there a near removed?	[]Yes	⋈ No	
(Comments:	-		
	· · · · · · · · · · · · · · · · · · ·			
	DECISION: [] Rem			
	Go t	anded Removal Assessment o Section 7		
	Not Go t			

4.0 OTHER INFLUENCING FACTORS

Assign a high, medium, or low priority category to each of the following factors and then use these factors to help make preliminary recommendations in Section 5. A high priority influence may indicate that a Preliminary Assessment should be conducted as a high priority without regard to other screening factors.

Other Influences		High	Medium	Low	
1.	Site remedial/ removal history	[] None	i∕∰ Some	[] All wastes removed	
2.	Regulatory involvement	Mo involvement	[] Somewhat involved	[] Other agency currently active	
3.	Environmental justice	[] Site is in low income/minority neighborhood		Site is not in low income or minority neighborhood	
4.	Brownfields/Redevelop- ment	[] Possible candi- date	5	Not a likely candidate	
5.	Political attention	[] Very visible/vocal	[] Some involve- ment	Mone None	
6.	Public attention	[] Very visible/vocal	[] Some involve- ment	∭ None	
7.	Remedial Costs	Likely very. expensive or diffi- cult		[] Easy and relatively cheap	

Comments:
From 1990 to 1993, 50 35-gallon drums containing waste paints
used boilt filters, and built rags were transported off-site for
disposal According to the U.S. EPA tiles, there were still some
brums of hazardous waste stored on the sites and also a former 8,000-
gallon paint and water summe that was used during the wet-painting
process. Northing is said in the files about how this waste was
disposed of Also, there have been he soil or groundwater samples
taken for the site. Therefore it has not been confirmed whether or
not there is artholly still hazardous waste present on the site.

OTHER INFLUENCING FACTORS CATEGORY:

HIGH

MEDIUM

LOW

5.0 PRELIMINARY RECOMMENDATIONS

Use the information in sections 1 through 4 and professional judgement to make a preliminary determination of the need for further investigation of the actual or potential threat posed by hazardous substance contamination at this site. Select one of the following options for site disposition.

5.1. Prioritize for Site Assessment

Further site assessment appears warranted (PEA/SI).

5.1.a. Prioritize for Site Assessment under State Lead

[]

Complete Section 6 to determine if site should be high, medium, or low priority for further assessment.

5.1.b. Prioritize for Site Assessment under EPA Cooperative Agreement



Complete Section 6 to determine if site should be high, medium, or low priority for further assessment.

5.2. High Priority Site Assessment

[]

The influencing factors in Section 4 suggest that further site assessment be conducted as a high priority. Go to Section 7.

5.3. Referral To DTSC'S Hazardous Waste Management Program (REFRC)

[]

Recommend REFRC for sites that can be remediated as a Corrective Action under H&S Code 25187. Go to Section 7.

5.4 Referral to Regional Water Quality Control Board (REFRW)

[]

Recommend REFRW for sites that fall under RWQCB authority and for which RWQCB is providing oversight of investigation/remediation. Go to Section 7.

Referral to another agency (REFOA)

[]

Recommend REFOA for sites where another agency (other than RWQCB) is providing or has provided oversight. Go to Section 7.

5.6 No Futher Action Under CERCLA

[]

Recommend No Further Action for sites where documented contamination is not significant by EPA/DTSC standards and the presence of greater contamination is unlikely. Go to Section 7.

6.0 SITE PRIORITIZATION WORKSHEET

Site Name: Jerus Wah Co.	Site Screener: Joseph Cully
EPA ID Number: <u>CA 100833.946.7</u>	Date: November 25, 1997
Site Assessment Phase: Site Prioritize	ation

The following risk-based criteria should be used as a guideline to assist in the prioritization of pre-CERCLIS and CERCLIS sites. These guidelines can be used in various stages of assessment. When interpreting the information provided below, one should understand that conservative assumptions were made where information is lacking and the risk value is subjective.

Site screeners should complete this form by using the categories as guidelines. The "Notes" sections should be used to document assumptions made, data sources, or other information pertinent to determining risk prioritization.

6.1 HAZARDS IDENTIFICATION

Complete the sections below for the suspected contaminants of greatest concern. Use SCDMs as a reference for assigning hazardous substance risk category. Assign a Hazard Factor for each hazardous substance evaluated and then assign an Overall Hazard Factor Value combining the separate Hazard Factors. If only one hazardous substance is evaluated, the Overall Hazard Factor Value will be the same as the Hazard Factor for A.

HAZARDOUS SUBSTANCE A: Tetrachloroethylene								
Estimate the risk	Estimate the risk associated with the hazard properties for this hazardous substance.							
Hazard Property								
Quantity	[] ≥10,000 lbs; or or 5 mil. gals; or or 25,000 yds³	[] <10,000 lbs and ≥100 lbs; or <5 mil. gals and ≥50,000 gals; or <25,000 yds³ and ≥250 yds³	√<100 lbs. or 50,000 gals. or 250 yds³					
Toxicity	[]≥10,000	🌂<10,000 and ≥100	[]<100					
Mobility	[3]	[]<1 and ≥0.001	[]<0.001					
Bioavailabilty	[]≥1,000	∑Y<1,000 and ≥10	[]<10					
Concentration (if known)	[] ≥benchmark =	[] near benchmark = 17.43/L	[] low relative to benchmark =					
Level of Containment	[] None	j∕⊈Partial	[]Full					
Hazard Factor HIGH for A		MEDIUM	LOW					

Comments: Berchmark based or August 1, 1996 Presminary Remediation books of U.S. EPA for groundwater in industrial areas: Ne samples have been taken, so the concentration is unknown

HAZARDOUS SUBSTANCE B: Trich loroethy love								
Estimate the risk	Estimate the risk associated with the hazard properties for this hazardous substance.							
Hazard HIGH MEDIUM LOW Property								
Quantity [] ≥10,000 lbs; or or 5 mil. gals; or or 25,000 yds³		[] <10,000 lbs and ≥100 lbs; or <5 mil. gals and ≥50,000 gals; or <25,000 yds³ and ≥250 yds³	<100 lbs. or 50,000 gals. or 250 yds³					
Toxicity	[]≥10,000	[] <10,000 and ≥100	⋈ <100 -					
Mobility	M 1	[] <1 and ≥0.001	[]<0.001					
Bioavailabilty	[]≥1,000	[X] <1,000 and ≥10	[]<10					
Concentration (if known)	[] ≥benchmark =	[Inear benchmark = 7 mg/L.	[] low relative to benchmark					
Level of Containment	[] None	[XPartial	[]Full					
Hazard Factor HIGH		MEDIUM	LOW					

Comments: Benchman	for groundwater in actual concentration is	industrial are	re limitary as. No samp	Remediation les have
peen voluen is 4 ha	actual (Unientroties 1)	47 760 Wh.		
	-			

OVERALL HAZARD FACTOR VALUE:

HIGH

MEDIUM

LOW

6.2 VULNERABILITY ANALYSIS

Assign a risk category to each of the following vulnerability factors. Assign an Overall Vulnerability Factor Value for the site based on the dominant vulnerability risk categories.

	Vulnerability Factor	High	Medium	Low
1.	Environmental Setting - Land use within 0.5 miles of the site	[] Residential	[] Agricultural/ Commercial	Industrial
2.	Sensitive Populations - Children, the elderly, or groups with poor health live:	[] Within 0.25 miles of site	Sommercial	More than 0.25 miles from site
3.	Population Density - Evaluate within 0.5 miles.	[]Dense	Moderate	[] Sparse
4.	Groundwater Use - Wells used for drinking water are located:	DWithin 0.5 miles of the site	[] 0.5 to 2 miles from site	[] More than 2 miles from site
5.	Groundwater Contamination - Evaluate groundwater contamination within 2 miles of the site.	[*] Known	Possible	[] Not likely
6.	Surface Water Location - Distance to nearest surface water body. If used for drinking water or known to be contaminated, bump to next higher risk category.	[] Within 0.5 miles of the site	[] 0.5 to 2 miles from site	More than 2 miles from site
7.	Sensitive Habitats - Distance to nearest sensitive habitat. If known or projected contamination within habitat, bump to next higher risk category.	[] Within 0.5 miles of the site	[] 0.5 to 2 miles from site	More than 2 miles from site
	Soil/Air Contamination - Evaluate the potential for exposure to individuals from contaminated soil or air releases.	[] Documented or probable exposure	[] Potential for exposure	DExposure not likely
•	Sampling Data Confidence - Evaluate the quality of any data available for the site.	[] No oversight; no QA/QC; no data	oversight; EPA methods; partial or unknown QA/QC	[] Regulatory oversight; _EPA methods; QA/QC validation

Notes:		
	·	-
		-
		-
		-
OVERALI VIII NEPARILITY FACTOR		•0

OVERALL VULNERABILITY FACTOR VALUE:HIGH



LOW

6.3 PRIORITIZATION SCREENING RISK ANALYSIS

Assign a Site Priority Level based on the dominant risk categories given for the hazard and vulnerability factor values.

HAZARD FACTOR VALUE	HIGH	MEDIUM	LOW
VULNERABILITY FACTOR VALUE	HIGH	MEDIUM	LOW
SITE PRIORITY LEVEL	HIGH	MEDIUM	LOW

Additional Comments:						
· <u></u>	ş:					
	4					
		<u>t</u> s		1 2		
					-	
			e			
		7				

7.0 S	SITE RECOMMENDATION	
	Name: Jervis Webb Co. Site Screener: Joseph Cully D Number: CAPOU833 9467 Date: November 25, 1997	
7.1.	Futher Site Assessment Warranted	
	7.1.a Under State Lead High Priority []	
Recon	mmend further site investigation under State lead.	
	7.1.b Under EPA Cooperative Agreement High Priority [] Medium Priority Low Priority []	
Recon	mmend further site investigation under the EPA cooperative agreement.	
7.2.	Recommended for Removal Assessment or Expanded Removal Assessment	[]
Recon	mmend referral to EPA's Removal Section.	
7.3.	Referral To DTSC'S Hazardous Waste Management Program (REFRC)	[]
Recon 25187	mmend REFRC for sites that can be remediated as a Corrective Action under H&S	Code
7.4	Referral to Regional Water Quality Control Board (REFRW)	[]
	mmend REFRW for sites that fall under RWQCB authority and for which RWQCB is proight of investigation/remediation.	viding
7.5	Referral to another agency (REFOA)	[]
	mmend REFOA for sites where another agency (other than RWQCB) is providing of ded oversight.	or has
7.6	No Futher Action Under CERCLA	[]
	mmend No Further Action for sites where documented contamination is not significant DTSC standards and the presence of greater contamination is unlikely.	ant by
· /	ments: Sampling needs to be done, and no other agency	
EPA	CONCURRENCE:signature da	ate

Attachment A

SITE SCREENING CONTACT LOG

Site Name: <u>Jerv's Welch Co.</u> Site Screener: <u>Joseph Cully</u>

Site Name: <u>Jervi.</u>	o Webh (o.		Site Screener: Joseph (n/ly			
Contact Name	Affiliation	Telephone Number	Date	Discussion		
John Rhedes	LA-RWQ(B	12 13J 266- 7500	9/15/	Left message with Mr. Rhodes, asking him if there was any status with RWQCB for this site.		
Erle Gonzales	1 / 6 5					
FIR GOLZAHA	L. A. Co. Five Pept. : Paramount	(562) 790-	9/15/			
	Office	1 1 10	17	Reliable Steel, Jervis-Webb		
				went out of business at this site on March 29, 1996, and the		
		×		Corporation is how located at		
·				34375 West Twelve Mike Roads Farmington Hills, MI		
		a.		48331 (8/0) 553-1000.		
·				Reliable Steel only generated very small quantities of		
				waste oil and does hot		
		ē		Mr. Conzales Feferred me to		
+ 11	I A C to	(713)890-	· a 1151	tom Klinger, his supervisor,		
Tom Klinger	L.A. Co, Fire Dept.: Supervisor	4106	97	With Wir, Klahaer		
es *				Cleanup action against this		
,				site by L. A. County Health Haz. Mat.		
tom Klinger	1)	l l	9/16/	L.A. (o. Site Mit. is hot over-		
				site.		
Jenny Au	LA-RWQ(B	(213) 266- 7576	10/28	RWQCB is not working on this site.		
				ym>), vc,		

ATTACHMENT B

SITE SCREENING OBSERVATION RECORD

Site EPA	Name: Jews- Webb ID Number: CADOO \$ 339	Site Screener Date:	: Joseph Cully			
						
1.	Status:	Active	Different Company &			
2.	Setting:	Residential Industrial Paved Restricted access Near RR Tracks Right work Vegetation Bushes around st	Commercial Agricultural Unpaved Unrestricted access Near drainage C, Trees in parking late			
	Visibility:	(2)				
4.	Containment: Pond Drums Trash can Piles Stored On: Bare Ground Gravel Waste Type: Inert Solid	Concrete	OtherPalletsOtherLiquidGas			
5.	Distance to surface water an	nd sensitive environments or ecosy	ystems:			
6.		ools, daycare facilities, hospitals,	nursing homes, etc.:			
7.	Estimated number of people	living or working in the area: <u>#e</u> a	wily adustratized,			
8.	. Distance to food processing/packaging or agricultural production:					

4630 SP

EPA REGION IX SITE SCREENING CHECKLIST

This review checklist is to be used by individual site screening staff when reviewing sites which have been brought to the attention of EPA or the State. Each site is reviewed on the merits of the discovery documentation and additional information gathered during the screening process. The guiding principal in evaluating a given site is to use common sense in assessing the information and subsequently presenting the site and its known hazardous potential to the SST.

1.0 GENERAL INSTRUCTIONS

Complete Section 1 for the site using readily available information and contacting appropriate individuals. A contact log (Attachment A) should be used to document information gained through correspondence, interviews, and telephone calls. Handwriting is acceptable if it is legible. Attach extra pages if necessary.

1.1 Site Information

Site Name:	Te	rvis Webb Co.	*	
Alias Name:				
Site Street Address:	93	Ol Raya Ave.		
City, County, State:	Soy	11 (1/1/1/1/1/1/1/1/1/1/1/1/1/1/1/1/1/1/	/	^
50 0 E00	(A	harazzaur 7		_ Q .
EPA ID Number:	- A	VUV 8)) 176 /		In Internation
Site Screener:	10	seph (ully	Date	: November 25, 199-
Date of Discovery:	_03	/14/93		
Discovery Vehicle:				
[] County Referral [] Citizen Petition [] RCRA Referral		State Referral State PA/SI Grant Nonemergency Release Report	[]	Lawsuit Removal Newspaper Other
Is this site part of an NPL site? [] Yes	j⊠ No		
CERCLIS Status: [] Other (specify):		Discovery PA SI	[]	NFRAP Not in CERCLIS
State oversight role: PA/SI Cooperative Agreement [x Cooperative Agreement Number:] Yes V99925	[] No [] Not applicable 52 -01-02	*	
EPA Project Officer: Rachel Loftin	8	361		
RCRA Status:	N	Generator TSDF	[]	Transporter Not listed in RCRIS
In a State Database(s)? [] Yes	M No	If yes, specify.		**************************************

1.2 CERCLA Eligibility

If the answer to question 1 is "No", or if the answer to any question of 2 through 8 is "Yes", the site is ineligible for CERCLA evaluation and the decision at the bottom of this page is "No Further Action Under CERCLA". The answers to questions 9 through 16 should be used to identify sites that may not be appropriate for CERCLA evaluation without further justification. If a question cannot be answered, explain why in the Comments section below.

1.	Has a release of hazardous substances, pollutants, or contaminants occurred?		[🏖 Yes	[] No
2.	Does the release or threat of release consist only of crude oil or unaltered petroleum product?		[]Yes	[≯] No
3.	Is the site subject to corrective action under RCRA Subtitle C (hazardous waste treatment, storage, or disposal facility)?		[]Yes	[≯No
4.	Does the release or threatened release fall under the jurisdiction of the Uranium Mill Tailings Radiation Control Act (UMTRCA)?		[]Yes	[∕≱No
5.	Does the release or threatened release fall under the jurisdiction of the Atomic Energy Act (AEA)?	19-11	[]Yes	Ŋ No
6.	Is the release or threatened release a result of a legal application of pesticides under Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA)?		[]Yes	ŊNo
7.	Is the release or threatened release regulated under the Oil Pollution Act (OPA)?		[]Yes	[] No
8.	Is the release or threatened release permitted under the Nuclear Regulatory Commission (NRC)?		[]Yes	⋈ No
9.	Is the site a federal facility?		[]Yes	No
10.	Is the site outside of U.S. boundaries?		[]Yes	⊠No
11.	Is the site outside of EPA, Region IX borders?		[]Yes	[≽] No
12.	Is the site within Native American Tribal lands?	×	[]Yes	⊬ No
13.	Is the site currently under the control and management of a state/local agency? If yes, which agencies?		[]Yes	‰] No
14.	Is the site currently operating?		Y Yes	[] No
15.	Is the site address valid?		. [➢Yes	[] No
16.	Has the site been investigated under an alias?	20	[]Yes	∭ No
Cor	erated by Reliable Steel	Now	owned a	nd

DECISION: [] No Further Action Under CERCLA
Go to Section 7

[Go to Section 2

2.0 TECHNICAL INFORMATION

This section contains information about site's operational history and environmental sampling. Complete the following section by filling in the blanks or checking the appropriate boxes. If a question cannot be answered, explain why. If a drive-by is performed, complete Attachment B.

2.1 Operational History

18. List present site owner(s) and operator(s). [Include dates of ownership]: New York of the owner and operator of this site
since March 19, 1996, when Tervis lorp, went out of busikess.
1b. Are hazardous substances presently on site?
If yes, how and where are substances stored and used? Rehable Steel only generates very small quantities of waste oile
2
2a. List historic site owner(s) and operator(s). [Include dates of ownership]: Before 1950, this site was underveloped agricultural land, 1950-Jervis puril the manufacturing building and began operating a custom conveyor and crane manufacturing facility. Until 1996, this site was owned by Jervis B. Webb Company of Farmington, Michigan.
2b. Were hazardous substances present on site in the past? [] Yes [] No
If yes, how and where were substances stored and used? S-000-gallen witer and pail of samp.
Additional comme: s: Dervis has operated a conveyor manufacturity shop at the site sixee the 1950's. Undocumented quantities of oil-based paint wastes were generated on site in a former 8,000-gallen water and paint sump. Paints used on site have contained head chromate.

2.2 Contaminant(s):

List any hazardous substances, pollutants, or contaminants that have been identified at the site and indicate whether they have been quantified (e.g., by sampling).

[] Ammonia [] Arsenic [] Asbestos [] Beryllium		[] [] [] [] []		T.
[] Carbon tetrachloride [] Chloroform			[] [] [] [] [] [] [] [] [] [] [] [] [] [lorgethy lene lorgethy lene
Additional Comments: Lead and chromium are suspected due to the lead chromate part that was handled there. Although he soil or groundwater sampling has been conducted at this site, this site is located in an industrial area within the area of a Khown groundwater contamination plume of trichloreethylene (T(E) and tetrachloreethylene) perchloroethylene (P(E).				

2.3 Has a release as o	efined in CERCLA Sec	tion 101(22) occurred?
₹ Ye	[] Suspected	[] No
Identify the source(s) of the repile, etc.): A former 8,16 the with painting programmer 8,55 - gallet drum; continued off	COO-gallon paint and ress. The runn was rein the mid-1989's	e.g., drums, landfill, surface impoundment, waster water summ was used during soverhed to held paint filters for Also, from 1990 to 1993, 50 and paint tags;
2.4 Pathway(s) of con	taminant migration:	
[] Air	[XPGroundwater [] Su	urface Water [] Soil
Briefly describe any identified with a 4-hit to samp has at grown water systems. That	dipathway: There are adisus of the site of water 57 dishtish serve approprimate	many drinking water systems towerer, There has been he g water wells, 12 drinking by 410, 506 people
_		
2.5 Sampling History	ž	
1. Has sampling been con-	ducted? []Yes ⋈ No	*
 If environmental samplir C, to record the informa 		he Sampling Event Summary Table, Attach-ment
2.6 Additional Inform	ation	
A regional trick	ditional information that may lero ethylere and bren identified in seil or groundwa	be used to support site screening decisions. Letrack love of the lone of town d- The South bete area However Ler som pling in this area.
		3



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION IX

75 Hawthorne Street San Francisco, CA 94105-3901

February 27, 1997

Mr. Eli Stanesa Jervis B. Webb Company 34375 West Twelve Mile Road Farmington Hills, Michigan 48331-5624

> Re: Request for Reassessment of the Jervis B. Webb Company of California Property at 9301 Rayo Avenue, South Gate, California EPA ID Number: CAD 008339467

Dear Mr. Stanesa:

EPA is aware that the Jervis B. Webb Company ("Webb") is in the process of trying to sell the property it owns at 9301 Rayo Avenue ("Rayo parcel"). The Rayo parcel, along with the property owned by Webb and located at 5030 Firestone Boulevard ("Firestone parcel"), comprise the property that was the subject of a Preliminary Assessment /Site Inspection conducted by EPA and its contractors. The EPA CERCLIS ID Number for this property is CAD 008339467.

In an effort to facilitate the sale of the Rayo parcel, Webb requested that EPA reassess the Rayo parcel in light of cleanup actions that were recently completed at the Rayo parcel and, if appropriate, remove the site from the active CERCLIS database. On January 16, 1997, Erler & Kalinowski, Inc. ("EKI") submitted a request for reassessment to EPA on behalf of Webb along with documentation regarding the underground storage tank closure activities as well as other general site cleanup work. EPA has reviewed the report submitted by EKI and finds that the work performed in closing the underground tank and in cleaning up the utility trench is satisfactory with respect to the areas of the Rayo parcel addressed by those actions. However, we feel that additional sampling for VOCs should be conducted at both the Rayo and Firestone parcels to address concerns regarding historical solvent usage by Webb..

Pursuant to our review of the Preliminary Assessment/Site Inspection and based on our knowledge of historical operations at the Firestone parcel, EPA would require additional sampling for VOCs in the following areas prior to making any determination with respect to removing the site from the active CERCLIS database: 1) sampling at the location of the hazardous waste storage area on the Firestone parcel; 2) sampling beneath the paved area between the Rayo and Firestone buildings where parts cleaning was formerly conducted; and 3) sampling in the drainage

area to the west of the parts cleaning area. Should you decide to undertake this work, we recommend that you submit a sampling plan to EPA and the California Regional Water Quality Control Board for our review prior to sampling to avoid unnecessary resampling.

EPA remains committed to working with Webb to identify any environmental work that may need to be completed at the Rayo and Firestone parcels prior to "archiving" or removing this site from the active CERCLIS database. If you have any questions regarding this matter, please contact Steve Simanonok of my staff at (415) 744-2358.

Keith Takata

Director

Superfund Division

Keith Taka -

cc: Steve Miller, EKI (via fax)



To:

Jim Hanson

CC:

Betsy Curnow

Subject: Re: First Region 9 "Discomfort Letter"



Here's my 2 cents on the "Discomfort Letter". My comments are based on our discussions about looking for data that is usable to re-score and NFA or archive the site...

We should strenghten the last sentence in the 2nd paragraph to indicate that the additional samping for VOCs is needed from locations on and surrounding the Rayo property.

Depending on the approach that will be used for the sampling (e.g., one event, or phased sampling) you may want to indicate what type of sampling is being requested. To re-score the site, data from soils and shallow groundwater would be needed. Some of this may be available from RWQCB which could streamline what the RP would need to do. They may also want to get soil gas samples since the VOCs may not show up in the soils even though they are in groundwater. The soil gas data could be used to establish the absence or presence of the VOCs on site. The soil gas isn't necessary for re-scoring, but could clear this RP.

? How were the 3 sampling locations identified? If comparable background samples are not currently available, they will need to collect samples from areas that would not be expected to be contaminated or impacted from site activities. Its also possible that the locations identified in the letter could change after a review of their existing data as compared to the data available from the CERCLIS file and RWQCB. Maybe we could say these are tentatively identified locations.

Do we know what RWQCB's current involvement is?



REMEDIAL SITE ASSESSMENT DECISION - EPA REGION IX

Site Name: Jervis B. Webb Co. EPA ID#: CAD 008339467
Alias Site Names: Jervis B. Webb Company of California
City: South Gate County or Parish: Los Angeles State: CA
Refer to Report Dated: 7/1/94 Report type: PA/SI
Report developed by: Bechtel Environmental, Inc.
DECISION:
1. Further Remedial Site Assessment under CERCLA (Superfund) is not required because:
1a. Site does not qualify for further remedial 10. Site may qualify for further RCRA site assessment under CERCLA action, but is deferred to: NRC (Site Evaluation Accomplished - SEA)
2. Further Assessment Needed Under CERCLA: 2a. (optional) Priority: Higher Lower
2b. Activity PA
Other:
DISCUSSION/RATIONALE:
Report Reviewed, Approved, and Site Decision Made by: Milip Armotrony Signature: Miliphul Date: 9/30/44

REMEDIAL SITE ASSESSMENT DECISION - EPA REGION IX

Site Name: Jervis B. Webb Co. EPA ID#: CAD 0083:	39467
Alias Site Names: Jervis B. Webb Company of California	
City: South Gate County or Parish: Los Angeles	State: CA
Refer to Report Dated: 7/1/94 Report type: PA/SI	
Report developed by: Bechtel Environmental, Inc.	
DECISION:	
1. Further Remedial Site Assessment under CERCLA (Superfund) is not required because:	
1a. Site does not qualify for further remedial site assessment under CERCLA action, but is deferred to: (Site Evaluation Accomplished - SEA)	RCRA NRC
2. Further Assessment Needed Under CERCLA: 2a. (optional) Priority: Higher	Lower
2b. Activity PA	
Other:	,
DISCUSSION/RATIONALE:	
Report Reviewed, Approved, and Site Decision Made by: Signature:	Date:

Jim Quint U.S. EPA tale Evaluation & Gants Bedion (415) 744-2331.

SUBJECT: Kustum Fit Hi-Tech Scaling Products, Inc. & Jesvis B. Webb Company.

The final recommendation was not noted on the PASI seport for the above two sites. I contacted fin Guint I EPA. He stated that by mistake being dist not put his secommendation. The leptical and EPA secommended Low priority further studies. Therefore, BPA is still but lead agency.